

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

STEVEN KNURR, Individually and on Behalf) Civil Action No. 1:16-cv-01031-TSE-MSN
of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
ORBITAL ATK, INC., *et al.*,)
Defendants.)

)

PLAINTIFFS' MOTION TO AMEND

PURSUANT TO Rule 15(a)(2) of the Federal Rules of Civil Procedure, and for good cause shown, Lead Plaintiff Construction Laborers Pension Trust of Greater St. Louis and Named Plaintiff Wayne County Employees' Retirement System ("Plaintiffs") move the Court to enter an order allowing them to file a second amended complaint, on the grounds and for the reasons stated with particularity in the accompanying brief. The proposed second amended complaint (REDACTED) is attached, and a proposed order is submitted herewith.¹

Undersigned counsel verifies that a good faith effort to resolve or narrow this dispute without court intervention was undertaken, but unsuccessful.

Dated: August 8, 2018.

Respectfully submitted,

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¹ The new allegations are found at ¶¶ 216-249. The proposed pleading is redacted because the Defendants are claiming a confidentiality interest in these facts.

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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2018, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

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